

DATE: JUN 18 2004

SUBJECT: Dayco Corp./L.E. Carpenter Company Site

FROM: Michael Clementson, Environmental Scientist
Hazardous Waste Support Branch (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager
New Jersey Remediation Branch (ERRD-NJRB)

As per your request, we have reviewed the "Remedial Action Work Plan for Source Reduction," prepared by RMT, Inc., dated April 2004, for the Dayco Corp./L.E. Carpenter Company site located in Wharton Borough, Morris County, New Jersey.

According to the document there will be wetland impacts associated with the remedy. There are no details provided regarding wetland restoration (e.g., seeding/planting, community type, post-restoration monitoring). As per the Clean Water Act (Section 404, Protection of Wetlands E.O. 11990, 40 CFR 6 App A) a wetlands assessment and restoration plan will be needed for any wetlands impacted or disturbed by the remedial activities. Additionally, whenever possible, Management Practices (according to Federal Register Vol. 51, No. 219, Part 330.6) should be followed to minimize unavoidable impacts (e.g., spread of contaminants, roadways) to wetlands to the maximum extent practicable while designing/implementing the remedy. Should you require additional information regarding wetland issues, the BTAG and/or John Cantilli (212-637-3810) of the Water Programs Branch are available for assistance.

PCB-impacted soil is proposed to be removed from the wetland. The discussion of this activity should indicate the approximate square foot area of wetlands that will be excavated. It would also be useful to include this area on one of the site maps.

The section discussing the conceptual end use plan for the site describes an area that would become wetland habitat. It should be clarified if this area is a new wetland that will be created or if it is the restoration of the wetland that will be excavated as part of the remedy.

If you have any questions, comments, or require further information, please contact me at (732) 321-6712.

cc: Carole Petersen, ERRD-NJRB
Kim O'Connell, ERRD-NJRB
John Cantilli, DEPP-WPB
Lorne LaMonica, DEPP-SPMMPB

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06/16/2004 02:55 PM

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Stephen

Attached please find a file copy of the DESA/HWSB memorandum regarding the Dayco Corp./L.E. Carpenter Company site. Final hard copies to follow. If you have any questions or would like to discuss, please contact me.

Michael



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